



Engaging and Inspiring Healthy Communities

December 7, 2019

The Honorable Ajit Pai, Chairman
The Honorable Michael O'Rielly, Commissioner
The Honorable Brendan Carr, Commissioner
The Honorable Jessica Rosenworcel, Commissioner

Chairman
Federal Communications Commission
455 12th Street, Southwest
Washington, DC, 20544

Dear Chairman Pai,

We write to support the Comments of Brattleboro Community Television, Inc. (File ID 1113560010350) and to disapprove of the proposals and tentative conclusions set forth in the FCC's September 25 Further Notice of Proposed Rule Making in *Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984 as Amended by the Cable Television Consumer Protection and Competition Act of 1992*, MB Docket 05-311.

West River Valley Thrives is a small substance use education and prevention organization with a very limited budget and a great need to use all media possible to deliver our message and share our programming. Our mission is to create opportunities for meaningful contributions to support and promote healthy lifestyle choices with an emphasis on the prevention of alcohol, tobacco, and other drug use by young people. We serve seven towns in the West River Valley that include Brookline, Jamaica, Marlboro, Newfane, Townshend, Wardsboro, Windham and their associated villages, comprising a rural population of approximately 10,000 people. We rely on BCTV to cover our events, produce content, and deliver important messaging to our widely dispersed rural population. Many of our citizens are low income and cannot attend our events. Local access TV is one of the only ways we can reach this audience. See this BCTV-produced show, *Youth and the Impact of Vermont's Marijuana Law*, that was sponsored by my organization: <https://www.youtube.com/watch?v=U2m7WgHjBKU&t=6s>. This aired 11 times on BCTV in order to provide maximum coverage to our rural citizens over a wide swath of times. We value and rely on BCTV, their diverse and informative programming, the training and support they have given our staff and students (this video was produced by one of our high school students after training from BCTV staff: <https://www.youtube.com/watch?v=XS4LX5S0abU>), and their overall service to our communities in southern Vermont.

This local presence enables the residents of our towns to create and watch uniquely local programming about their community and local events and issues of interest to them. And that was the intent of the PEG provisions of the 1984 Cable Act – to enhance local voices, serve local community needs and interests, and strengthen our local democracy. By defining “franchise fee”



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in an overly broad fashion to include “in-kind” support, the FCC’s proposals will shift the fair balance between cable franchising authorities and cable operators – something that was never the intent of the Act – and could ultimately result in such reduction in franchise fees as to defund PEG Access in our state.

We appreciate your consideration and hope you will protect PEG Access in our community and others by choosing not to adopt many of the proposals in the Further Notice.

Sincerely,

A handwritten signature in blue ink, appearing to read "S. Tavella".

Stephen Tavella
Director
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